

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN

FILED  
NOV 16 2022

U.S. DISTRICT COURT  
FLINT, MICHIGAN

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case: 4:21-cr-20749

Judge: Kumar, Shalina D.

MJ: Ivy, Curtis

ADRIAN ALE CHAVARRIA,

Defendant.

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**SUPERSEDING INDICTMENT**

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THE GRAND JURY CHARGES:

**COUNT ONE**

**18 U.S.C. § 922(g)(1) and 18 U.S.C. § 924(e)(1)  
Felon in Possession of a Firearm**

On or about March 23, 2020, in the Eastern District of Michigan, ADRIAN ALE CHAVARRIA, knowing that he had been convicted of a crime or crimes punishable by a term of imprisonment exceeding one year, knowingly possessed, in and affecting commerce, a firearm, that is: a Smith & Wesson, model 669, 9mm Luger caliber, semiautomatic pistol, in violation of 18 U.S.C. § 922(g)(1).

Defendant, ADRIAN ALE CHAVARRIA, having at least three previous convictions for a violent felony or a serious drug offense, committed on occasions different from one another, is subject to penalties provided under Title 18, United States Code, Section 924(e)(1).

**FORFEITURE ALLEGATION**  
18 U.S.C. §924(d); 28 U.S.C. §2461

The allegations contained in Count One of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. §924(d)(1) and 28 U.S.C. §2461. Upon conviction of the offense charged in Count One of this Indictment, ADRIAN ALE CHAVARRIA shall forfeit to the United States, any firearm and ammunition involved in or used in any knowing violation of 18 U.S.C. § 922 including but not limited to a Smith & Wesson, model 669, 9mm Luger caliber, semiautomatic pistol, serial number TAJ2412, one high-capacity magazine and 25 rounds of 9 millimeter ammunition.

THIS IS A TRUE BILL.

s/FOREPERSON

Dated: November 16, 2022

DAWN N. ISON  
United States Attorney

s/NANCY A. ABRAHAM  
Assistant United States Attorney  
2<sup>nd</sup> Floor Federal Building  
600 Church Street  
Flint, MI 48502  
(810) 766-5177

s/ANTHONY P. VANCE  
Assistant United States Attorney  
Chief, Branch Offices

United States District Court Eastern District of Michigan	Criminal Case Cover Sheet	Case Number: 21-cr-20749
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

<b>Companion Case Information</b>	<b>Companion Case Number:</b>
This may be a companion case based on LCrR 57.10(b)(4) <sup>1</sup> :	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: NAA

Case Title: USA v. ADRIN ALE CHAVARRIA

County where offense occurred: Genesee

Offense Type: Felony

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### Superseding Case Information

Superseding to Case No: 21-cr-20749 Judge: Kumar

Reason: Add a charge

Defendant Name

Charges

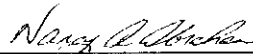
Prior Complaint (if applicable)

18 U.S.C. §924(e)(1)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case

November 16, 2022

Date



Nancy A. Abraham  
Assistant United States Attorney  
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Flint, MI 48502  
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<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.